

Message

From: Murdock, James [Murdock.James@epa.gov]
Sent: 2/8/2018 4:34:47 PM
To: Bernier, Roberto [bernier.roberto@epa.gov]
Subject: FW: Air Monitoring Data
Attachments: Arkema_ASPECT_Detections_20170907.pdf

Roberto,

Thanks for providing the Arkema air monitoring data. As you can see below, Arkema's attorney is also requesting our flyover data. Is that available?

Thanks again,

James

From: Amandes, Christopher B. [mailto:christopher.amandes@morganlewis.com]
Sent: Tuesday, February 06, 2018 6:07 PM
To: Murdock, James <Murdock.James@epa.gov>
Subject: RE: Air Monitoring Data

James,

Thank you, this is helpful. However, what would be more helpful and what I was hoping we could get were the results of EPA's flyover data. It may be that data is so voluminous that only the summary table EPA previously provided (attached) can provide any useful information.

It may be helpful to understand the genesis of this request. It comes as a result of a statement made by a Harris County Assistant District Attorney that he has a copy of EPA's flyover data and it shows a 8 ppm hit of acrolein and another hit (he did not specify how much) of phosgene at an elevation 2500 feet above the Arkema Crosby facility. I do not know how he came across this information, and I am skeptical that the Crosby plant could have been a source of acrolein or phosgene emissions. However, if the full set of EPA's flyover data is available, we would like to obtain it.

With respect to your question about the elevations of the back-up generators at Crosby, here is that data. All of the referenced elevations below are based on a Harris County Flood Control District disk in concrete located on the south side of Methvin Road, about 0.35 miles east from its intersection with La Due Road, with a published elevation of 50.03 feet, NAVD 88, 2001 Adjustment.

Administration Building

Generator 4-GN-1	Pad elevation: 51.49'	Natural ground: 50.47'
------------------	-----------------------	------------------------

Generator 4-GN-2	Pad elevation: 52.00'	Natural ground: 49.96'
------------------	-----------------------	------------------------

Temperature Controlled Product Storage

Generator 21-GN-1	Pad elevation: 52.97'	Natural ground: 51.07'
-------------------	-----------------------	------------------------

MPU Motor Control Center (MCC)

Generator 32-GN-1	Pad elevation: 53.40'	Natural ground: 52.89'
-------------------	-----------------------	------------------------

Wastewater Treatment Plant Motor Control Center (MCC)

Generator 39-GN-1 Pad elevation: 52.18' Natural ground: 51.38'

MPU Thermal Oxidizer

Generator 43-GN-1 Pad elevation: 53.54' Natural ground: 53.34"

Please let me know if you have any questions.

Chris

Christopher B. Amandes

Morgan, Lewis & Bockius LLP

1000 Louisiana Street, Suite 4000 | Houston, TX 77002

Direct: +1.713.890.5735 | Mobile: +1.832.646.3702 | Fax: +1.713.890.5001

christopher.amandes@morganlewis.com | www.morganlewis.com

Assistant: Renetta Parham | +1.713.890.5740 | renetta.parham@morganlewis.com

From: Murdock, James [<mailto:Murdock.James@epa.gov>]

Sent: Tuesday, February 06, 2018 11:01 AM

To: Amandes, Christopher B. <christopher.amandes@morganlewis.com>

Subject: Air Monitoring Data

[EXTERNAL EMAIL]

Chris,

I've attached the data I received from our on-scene coordinator. These data are from EPA contractors and from Liberty County.

James Murdock

Assistant Regional Counsel

RCRA & Toxics Enforcement Branch

U.S. Environmental Protection Agency, Region 6

1445 Ross Avenue, Suite 1200 (6RC-ER)

Dallas, Texas 75202

Tel. (214) 665-7302

Fax (214) 665-3177

murdock.james@epa.gov

DISCLAIMER

This e-mail message is intended only for the personal use of the recipient(s) named above. This message may be an attorney-client communication and as such privileged and confidential and/or it may include attorney work product. If you are not an intended recipient, you may not review, copy or distribute this message. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.